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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

TRUSTEES of the NORTHERN NEVADA
LABORERS HEALTH & WELFARE TRUST
FUND, CRAIG MADOLE, DAVE BACKMAN,
CRAIG HOLT, DAN RUSNAK, ELOY JARA,
RICHARD DALY; TRUSTEES of the LABORERS
PENSION TRUST FUND FOR NORTHERN
NEVADA, CRAIG MADOLE, DAVE
BACKMAN, CRAIG HOLT, DAN RUSNAK,
ELOY JARA, RICHARD DALY; TRUSTEES of
the CONSTRUCTION WORKERS VACATION
SAVINGS TRUST FUND, CRAIG MADOLE,
DAVE BACKMAN, CRAIG HOLT, DAN
RUSNAK, ELOY JARA, RICHARD DALY;
TRUSTEES of the LABORERS TRAINING
TRUST FOR NORTHERN NEVADA, CRAIG
MADOLE, DAVE ELIZONDO, FRED REEDER,
DAN RUSNAK, ELOY JARA, RICHARD DALY;

Case No. 3:18-cv-00455-RCJ-WGC

Plaintiffs,

vs.

PREMIER SCAFFOLD, INC., a California
corporation; and DOES 1 -10,

Defendants.

**STIPULATION AND ORDER
FOR EXTENSION OF TIME**

THIRD REQUEST

Plaintiffs, above-named, and Defendant Premier Scaffold, Inc., by and through their
respective undersigned counsel, hereby stipulate and agree to extend the time period for
Defendant Premier Scaffold, Inc. to answer, move, or otherwise plead up to and including April
23, 2019.

In this action the Plaintiffs seek audit entry against Defendant (#1). A ninety (90) day
extension of time was sought and granted because the parties agreed to an audit and ninety days

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1 was needed to schedule and perform the audit (#10). The audit was scheduled and the auditors
2 completed their field work at Defendant's place of business. The audit report was completed
3 February 20, 2019. The parties requested an additional extension of sixty (60) days to discuss the
4 audit report (#12). Following review and discussion of the audit report, Plaintiffs made a written
5 settlement demand. In response, Defendant made a written settlement offer. Plaintiffs are
6 formulating a written counteroffer. In view of ongoing settlement negotiations, the parties
7 request a additional extension of time to answer until April 23, 2019. Allowing this additional
8 extension of time will promote judicial economy because the matter may be resolved without the
9 necessity of Defendant filing an answer.

10 This is the third request for extension of time, and is not sought for purposes of delay.

11 DATED this 18 day of March, 2019.

12 JENKINS LAW FIRM
13 Attorneys for Plaintiffs

14 By: 

NATHAN M. JENKINS
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Reno, NV 89509

15
16 DATED this 18th day of March, 2019.

17 LAW OFFICES OF DIETRICH & SALAMONE, PLLC
18 Attorneys for Defendant Premier Scaffold, Inc.

19 By: /s/ Jonathan S. Vick

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23 **ORDER**

24 IT IS SO ORDERED.

25 DATED this 19th day of March, 2019.

26
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28 UNITED STATES MAGISTRATE JUDGE